

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ANDY KIM, in his personal capacity as a candidate for U.S. Senate, ANDY KIM FOR NEW JERSEY, SARAH SCHOENGOOD, SARAH FOR NEW JERSEY, CAROLYN RUSH and CAROLYN RUSH FOR CONGRESS;

Plaintiffs,

v.

CHRISTINE GIORDANO HANLON, in her official capacity as Monmouth County Clerk, et al.,

Defendants.

- and -

DALE A. CROSS, in his official capacity as Salem County Clerk, et al.

As Interested Parties.

Civ. Action. No.: 3:24-cv-1098 (ZNQ)(TJB)

**NOTICE OF MOTION *IN LIMINE* NO.
1 TO EXCLUDE ALL PROPOSED
TESTIMONY OF PLAINTIFFS'
EXPERTS**

To All Counsel of Record:

PLEASE TAKE NOTICE that, upon the accompanying brief and Certification of Jennifer Borek, Esq., defendants Christopher J. Durkin, Joanne Rajoppi, and Danielle Ireland-Imhof (“Defendants”), in their official capacity as County Clerks for Essex, Union, and Passaic Counties, respectively, by and through their undersigned attorneys, will move before the Hon. Zahid N. Quraishi, U.S.D.J., on March 18, 2024, for an Order, *in limine*, to exclude testimony from all of plaintiffs’ proposed experts in connection with the preliminary injunction hearing on March 18, 2024.

Respectfully submitted,

Dated: March 18, 2024

GENOVA BURNS LLC

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